

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

JOSE L RODRIGUEZ RUIZ
JO ANNE VAZQUEZ RODRIGUEZ
Plaintiffs

RECEIVED AND FILED
EMERGENCY FILINGS EMAIL
03/03/2023 - 1:54 AM
USBC
(WRT)

V
Defendants
ADM DE SISTEMA DE
RETIRO EMPLEADOS GOBIERNO
Y JUDICATURA
Defendants
POLICE DEPARTMENT OF THE
COMMONWEALTH OF
PUERTO RICO
Defendants
DEPARTMENT OF JUSTICE
FEDERAL LITIGATION DIVISION
Defendants
ASOCIACION DE EMPLEADOS
DEL GOBIERNO DE PUERTO RICO
Defendants
DEPARTMENT OF JUSTICE
ADVERSARY NUMBER: 16:00205-MAG

Informative Motion and Request for Reopening of Adversary Case for its Completion

To the Honorable Court
Plaintiff Jo-Anne Vasquez appears in her own right and respectfully pleads, exposes and requests.

She reported that I currently reside in the city of Boston, Massachusetts and my mailing address is 95 Bridle Path Circle Apt 925 Randolph, MA 02368.

On September 30, 2015, a Petition was filed under Chapter 7 of the Bankruptcy Law, case 15-07632. On October 22, 2015, the Retirement System filed a claim for a secured debt, and the property guarantees Debt. However, the Withdrawal System was duly notified. On December 4, 2015, Lcda. Elbia I. Vazquez Davila, who represented me on that date, contacted the mortgage loan division by telephone and reported the situation. At that time, she was provided with the names of the Lcda. Natalia Hernandez and that of Mrs. Mirna Muriel, who supposedly would resolve the situation.

In bankruptcy, the mortgage debt was delivered, since he did not have the economic capacity to pay the mortgage. Despite it, The Retirement System continued to deduct the mortgage payment from my monthly payroll. Said action by the agency is a violation of the Stay Order issued by the Bankruptcy Court in my case, Sec. 362 of the Bankruptcy Code.

Therefore, he very respectfully asked the court for a final resolution to the referring case with the number #. 16-205 and with reference to bankruptcy case # 15-07632 that was filed on September 30, 2015, which was already closed by court order as recorded in the files on April 18, 2016 and as provided by rule 5009 of the Federal Rules of Bankruptcy Procedure, to none of the included agencies not to appeal said decision.

That the Retirement Systems be ordered to return the accumulated money of 11,580 up to the date of December 13, 2016, to me, by not complying with the order of the bankruptcy court and continuing to discount the mortgage which had been included and the Withdrawal management never obeyed that order. As of the date of this motion, I have not received any payment.

The Withdrawal System insist that they were never notified that the property would be delivered to them, however, according to written documents on page 37 of the bankruptcy file dated September 30, 2015, it is written and can be corroborated and describes who said property belonged to and what would be done with it and "quoted "Property will be delivered". Therefore, at the moment in the Retirement Systems, on the date of presenting this motion, I appear with the mortgage debt.

I respectfully request the court to consider my request and order the Retirement System and/or agencies included in said motion to comply with the aforementioned terms and to pay my money in full and cancel the mortgage debt, which was included and accepted in the bankruptcy case mentioned above.

Attached Certification from the Puerto Rico Police with the Mortgage discounts that should not be made from October 12, 2015 to December 13, 2016.